

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARANDA LYNN O'DONNELL,)	
On behalf of herself and all others)	
similarly situated,)	
)	
Plaintiffs,)	Case No. 4:16-cv-01414
)	(Class Action)
v.)	The Honorable Lee H. Rosenthal
)	U.S. District Judge
HARRIS COUNTY, TEXAS,)	
)	
SHERIFF RON HICKMAN,)	
)	
ERIC STEWART HAGSTETTE,)	
JOSEPH LICATA III,)	
RONALD NICHOLAS,)	
BLANCA ESTELA VILLAGOMEZ,)	
JILL WALLACE,)	
)	
)	
Defendants.)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER

Eric Stewart Hagstette, Joseph Licata III, Ronald Nicholas, Blanca Estela Villagomez, and Jill Wallace (the "Hearing Officers") file this Unopposed Motion for Extension of Time to Answer and respectfully request an extension of the Hearing Officers' deadline to answer or respond to Plaintiff's Complaint in the above captioned matter. Eric Stewart Hagstette, Joseph Licata III, and Blanca Estela Villagomez were served with a copy of the summons and complaint and are due to respond on June 16, 2016. Ronald Nicholas and Jill Wallace have not yet been served. Counsel for Defendants has agreed to accept service on behalf of Ronald Nicholas and Jill Wallace in exchange for an extension of the deadline to answer or respond for the three

hearing officers already served. Defendants intend to file an answer or response for all five of the Hearing Officers jointly. This extension is not being sought for delay.

Defendants respectfully request that the Court grant this Unopposed Motion for Extension of Time, making the new deadline for the Hearing Officers to answer or respond to Plaintiff's Complaint **June 27, 2016**.

Respectfully Submitted,

GARDERE WYNNE SEWELL LLP

/s/ Katharine D. David

Katharine D. David
Federal I.D. No. 577391
Texas Bar No. 24045749
kdavid@gardere.com
Philip J. Morgan
Federal I.D. No. 1708541
Texas Bar No. 24069008
pmorgan@gardere.com
2000 Wells Fargo Plaza
1000 Louisiana Street
Houston, TX 77002-5011
713-276-5500 (phone)
713-276-5555 (fax)

*Counsel for Harris County, Texas,
Sheriff Ron Hickman, Eric Stewart
Hagstette, Joseph Licata III,
Ronald Nicholas, Blanca Estela
Villagomez, and Jill Wallace*

CERTIFICATE OF CONFERENCE

I certify that the parties conferred and Plaintiff's counsel does not oppose this motion.

/s/ Katharine D. David
Katharine D. David

CERTIFICATE OF SERVICE

I certify that on the 15th of June, 2016, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court.

/s/ Katharine D. David
Katharine D. David